

November 6, 2024

Via PACER

Hon. J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square, Courtroom 706
New York, New York 10007

Re: *Lehrman, et al. v. Lovo, Inc.*, Case No. 24-cv-03770-JPO
Letter Motion – Request for Additional Pages

Dear Judge Oetken,

We represent defendant Lovo, Inc. (“Lovo”) in the above-referenced action. We write this letter motion pursuant to Rule 1(A) and 2(B) of the Court’s Individual Rules and Practices in Civil Cases respectfully seeking an enlargement of the page limit for the Memorandum of Law in Support of Lovo’s anticipated Motion to Dismiss the Amended Complaint (currently due November 25, 2024) from 25 pages to 35 pages and of the page limit for its Reply Memorandum of Law in Further Support of that Motion from 10 pages to 15 pages.

The original complaint in this action was filed on May 16, 2024 (ECF No. 1) and it was 37 pages long, consisted of 159 enumerated paragraphs, and brought eight separate claims against Lovo. Lovo filed a motion to dismiss the original complaint on July 29, 2024, including a memorandum of law to dismiss all eight claims (which memorandum was 25 pages long) (the “Motion to Dismiss”) (ECF Nos. 16-17). Rather than respond to the Motion to Dismiss, Plaintiffs sought permission to file an amended complaint, which the Court granted (ECF Nos. 18, 20).

Pursuant to that order and the subsequently ordered Case Management Plan (ECF No. 21), Plaintiffs filed their Amended Complaint on September 25, 2024 and it was 71 pages long, contained 318 enumerated paragraphs and brought sixteen separate claims (and a new unnamed plaintiff and class also) (ECF No. 22). This Amended Complaint includes nearly all of the claims and allegations in the original complaint but adds substantial new claims (including conversion and copyright claims) and extensive factual allegations. Lovo believes that in order to thoroughly and adequately address all this material, it will need more than the 25 pages for its initial Memorandum of Law in Support of its Motion to Dismiss the Amended Complaint permitted by Rule 2(B) of Your Honor’s Individual Rules, and more than the 10 pages for the Reply Memorandum of Law permitted by this same Rule.

Thus, Lovo respectfully requests an enlargement of the page limit for Lovo’s Memorandum of Law in Support of its Motion to Dismiss Plaintiffs’ Amended Complaint from 25 pages to 35 pages and an enlargement of its Reply Memorandum of Law in Further Support of that Motion from 10 pages to 15 pages. No prior requests for the relief set forth above have been made. Plaintiffs have told us that they do not oppose this request, and, in turn, Lovo has consented to

Plaintiffs' request for an enlargement of their Memorandum of Law in Opposition to the Motion to Dismiss from 25 pages to 35 pages.

We thank the Court for its consideration of this request and are available to answer any questions.

Respectfully,

A handwritten signature in blue ink, appearing to read "Michael S. Lazaroff", written in a cursive style.

Michael S. Lazaroff

Cc: All counsel of record (via ECF)